

III. REMARKS

Claims 1-21 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1, 3, 10, 12, 16 and 18 are rejected under 35 U.S.C. §102(c) as allegedly being anticipated by Endo (U.S. Patent Pub. No. 2004/0212841), hereafter “Endo.” Claims 4, 7, 13 and 19 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Olejar *et al.* (U.S. Patent Pub. No. 2003/0037100), hereafter “Olejar.” Claims 2, 7 and 17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Deng (U.S. Patent No. 6,243,394), hereafter “Deng.” Claims 5, 14 and 20 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Lakshman *et al.* (U.S. Patent No. 6,078,564), hereafter “Lakshman.” Claims 6, 15 and 21 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Harris, Jr. *et al.* (U.S. Patent No. 6,144,975), hereafter “Harris.” Claim 8 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo and Olejar and further in view of Lakshman. Claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo, Olejar and Lakshman and further in view of Harris.

A. REJECTION OF CLAIMS 1, 3, 10, 12, 16 AND 18 UNDER 35 U.S.C. §102(e)

With regard to the 35 U.S.C. §102(e) rejection over Endo, Applicants assert that Endo does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 10 and 16, Applicants submit that Endo fails to teach receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a character of the data included therein. The Office equates the transaction type of the claimed invention with the transmission methods such as email, ftp, fax of Endo. Office Action, page 4, citing Endo, FIGS. 4-8; pp. 0055-0056, 0060-0065. To this extent, the transmission methods of Endo indicate the manner in which the document data is to be transmitted and not the does not define the character of the data itself. This distinction is further borne out in the language of the claims in which the character of the data is clearly distinguished from the format of the data. Conversely, Endo teaches no identification of the character of the data that is separate from its format.

In contrast, the claimed invention includes "...receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a character of the data included therein." Claim 1. As such, unlike the transmission methods of Endo, which indicate the manner in which the document data is to be transmitted, the transaction type that is included in the data of the claimed invention defines the character of the data. This transaction type is distinct from the format of the transaction as evidenced by the claiming of each as a distinct feature. For example, referring to Fig. 3 of the claimed invention the transaction type may distinguish between invoices and orders while the format distinguishes between formats X, Y and Z. Thus, the transaction type as included in the claimed invention is

not taught by the transmission methods of Endo, which are merely formats. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 10 and 16, Applicants respectfully submit that Endo also fails to teach that the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats. The Office cites a passage of Endo that it asserts teaches this feature. This passage describes the function of a document transmission controller, which “designates the document input source (the scanner 210 or the HD drive 205) of document data.” Pp. 0065, citing FIG. 3. To this extent, Endo teaches that its document data may be from one or two document sources. This passage, however, does not teach that document data may be in different formats, depending of the source. The passage cited by the Office goes on to teach that “...the document transmission controller 302 provides a data transmission format to the format converter 308 in accordance with the classified destination list.” Pp. 0065, citing FIG. 3. To this extent, the format that the document transmission controller of Endo provides is the format for the destination and not for the source. A format converter of Endo then converts the input document data to data in the designated data transmission format. Pp. 0065, citing FIG. 3.

In the Response to Arguments section of its Final Office Action, the Office states that “since different scanner or similar device may scan and save the data in various format, the input document need not necessary be of the same format.” Page 12. However, Endo does not explicitly teach that it may be used to convert input having various input formats or contains any mechanism for dealing with a plurality of input formats. To this extent, Applicants submit that the Office’s factual statement is unsubstantiated and amounts to Official Notice. Accordingly,

Applicants respectfully request that the Office withdraw the rejection or provide references that teach this feature.

The Office also states, in its Response to Arguments, "...that the features upon which applicant relies (i.e., that document data may be in different formats, depending on the source) are not recited in the rejected claims(s)." Page 12. Applicants respectfully disagree and submit that the language "...the data which is received in one of a plurality of formats..." specifically recites that the data may be received in one of a plurality of formats. To this extent, the language of the claims explicitly sets forth the feature that Applicants are attempting to convince the Office is not taught by Endo, that is, the ability to convert from many formats to many formats.

To this extent, the conversion of Endo that is from a single format (i.e., that of a scanned document retrieved directly from the scanner or from a saved scan) to a number of formats does not accomplish the many to many conversion of the claimed invention. This is because Endo does not teach that the input document data may be in one of a plurality of formats. Instead, the input document data of Endo is always in the same format, i.e. inputted from a scanner or the like. Abstract.

The claimed invention, in contrast, includes "...wherein the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats." Claim 1. To this extent, the application of the claimed invention does not merely convert input document data in a single predetermined format to a designated data transmission format as does the format converter of Endo, but is also adapted to transform data which is received in one of a plurality of received formats. For the above reasons,

the format converter of Endo does not teach the application of the claimed invention.

Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

B. REJECTION OF CLAIMS 2, 4-9, 11, 13-15, 17 and 19-21 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 7, as argued above with respect to independent claims 1, 10 and 16, Endo fails to teach or suggest receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a character of the data included therein. Furthermore, with respect to independent claim 7, as argued above with respect to independent claims 1, 10, and 16, Endo fails to teach or suggest that the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats. Olejar does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct

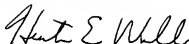
features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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Date: November 1, 2006

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